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November 8, 2022

Honorable Paul A. Engelmayer United States District Judge Southern District of New York 40 Foley Square, Room 2201 New York, New York 10007

Re.

D.A. Direct, Inc. v. China Int'l Freight Co., Ltd.

Lead Case No. 1:22-md-3028 (PAE) Related Case No. 1:22-cv-4609 (PAE)

Dear Judge Engelmayer:

We represent Defendant China Int'l Freight Co., Ltd. ("CIF") in the above-referenced proceedings. We write, with the consent of counsel for plaintiff D.A. Direct, Inc., to respectfully request that case no. 1:22-cv-4609 (PAE), originally filed in the Southern District of New York, be consolidated as a member case on MDL docket no. 1:22-md-3028. This action concerns the loss of containers from the ultra large container vessel ONE APUS and is subject to consolidation.

We thank the Court for its time and attention to this matter.

Very truly yours, Kaussu Wilgers

Lauren B. Wilgus

Cc: Counsel of Record (via ECF)

Granted. The Clerk's Office is respectfully directed to make 22cv4609 a member case in 22md3028. SO ORDERED.

PAUL A. ENGELMAYER

United States District Judge

November 9, 2022